

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 07-448 (DWF/JSM)

United States of America,  
Plaintiff,

v.

MOTION FOR DISCOVERY OF  
RULE 16(a) (1) (E) EVIDENCE

Joel Leslie Wells,  
Defendant.

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The Defendant, through his attorney, respectfully moves the Court for an Order directing that the government disclose expert witness information, pursuant to Rule 16(a)(1)(E) of the Federal Rules of Criminal Procedure. Effective December 1, 1993, the Federal Rules were amended to require disclosure of specific information regarding expert opinion testimony upon the request of the defense.

The Court-Ordered discovery should include the following:

1. A written summary of all testimony the government intends to introduce under Rules 702, 703 or 705 of the Federal Rules of Evidence during its case in chief at trial;
2. A description of the witness' opinions, including the bases and reasons therefore; and a record of the witness' qualifications.
3. As is the practice with the other disclosures required by Rule 16, we request that the production of this information be ordered to take place forthwith.

Dated: January 2, 2008

Respectfully submitted,

s/ Rick E. Mattox

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